

1 The Honorable Marsha J. Pechman  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

8 UNITED STATES OF AMERICA *ex rel.*  
9 Michael George Daggett,

Plaintiff,

10 v.

11 Regional Toxicology Services, LLC d/b/a Sterling  
12 Reference Laboratories and Rocky Mountain Tox,  
13 LLC d/b/a Cordant Health Solutions,

Defendants.

CASE NO. C15-5565-MJP

JOINT STIPULATION OF DISMISSAL

Noted for Consideration on:  
October 21, 2020

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15 Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure and the *qui tam* provisions  
16 of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with and subject to the terms and  
17 conditions of the Settlement Agreement (“Settlement Agreement”) and supplemental Side Letter  
18 signed by the United States; Sterling Healthcare Opco, LLC d/b/a/Cordant Health Solutions, acting  
19 as the corporate parent of Regional Toxicology Services, LLC and Rocky Mountain Tox, LLC  
20 (“Defendants”); and Relator Michael George Daggett, the United States and the Relator hereby  
21 stipulate, through their undersigned counsel, to the entry of an order dismissing the Complaint in its  
22 entirety *with* prejudice as to the Relator, and *with* prejudice to the United States only to the extent of  
23 the “Covered Conduct,” as that term is defined in the Settlement Agreement, and *with* respect to

1 Defendants, ("Parties") only but otherwise *without* prejudice to the United States.

2       2. The dismissal is without prejudice to any rights that any party may have under the  
3 Agreement, including the government's right, in the event of default, to rescind the Agreement and  
4 bring any civil and/or administrative claim, action, or proceeding against Cordant and/or any of its  
5 subsidiaries.

6       3. Relator agrees that the amount and terms of the Settlement Agreement are fair,  
7 adequate, and reasonable pursuant to 31 U.S.C. § 3730(c)(2)(B).

8       4. The Parties request that the Court retain jurisdiction over the matter to enforce the  
9 terms of the Settlement Agreement, should that become necessary.

10       5. The Parties further request that the Court enter an order in the form of the  
11 accompanying proposed order.

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1 Dated this 21st day of October, 2020.  
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Respectfully submitted,

4 TESSA M. GORMAN  
5 Attorney for the United States, Acting Under Authority  
6 Conferred by 28 U.S.C. § 515  
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